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18	Counsel for Defendant Google LLC	
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	UNITED STATES	DISTRICT COURT
20	NORTHERN DISTRICT OF CAL	JFORNIA, OAKLAND DIVISION
21	NORTHERN DISTRICT OF CAL	III ORIVIA, OAKLAND DI VISION
21	CHASOM BROWN, WILLIAM BYATT,	Case No. 4:20-cv-03664-YGR-SVK
22	JEREMY DAVIS, CHRISTOPHER	
	CASTILLO, and MONIQUE TRUJILLO, individually and on behalf of themselves and	DECLARATION OF JONATHAN TSE IN
23	all others similarly situated,	SUPPORT OF PLAINTIFFS'
24	an others similarly situated,	ADMINISTRATIVE MOTION TO
27	Plaintiffs,	CONSIDER WHETHER PORTIONS OF
25		PLAINTIFFS' REPLY IN SUPPORT OF
	V.	THEIR RENEWED REQUEST TO DEPOSE GOOGLE CEO SUNDAR
26	GOOGLE LLC,	PICHAI SHOULD BE SEALED (DKT. 677)
27	·	TICHAIGHOOLD DE SEALED (DIXI.0//)
	Defendant.	Judge: Hon. Susan van Keulen, USMJ
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TSE DECLARATION ISO PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL

Case No. 4:20-cv-03664-YGR-SVK

I, Jonathan Tse, declare as follows:

- I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 677.
- 3. On August 9, 2022, Plaintiffs filed their Administrative Motion to Consider Whether Another Party's Material Should Be Sealed regarding Plaintiffs' Reply in Support of their Renewed Request to Depose Google CEO Sundar Pichai ("Plaintiffs' Motion").
- 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5. Based on my review, there is good cause to seal the following information:

Basis for Sealing
information requested to be sealed contains Google's
ly confidential and proprietary information regarding
ly sensitive features of Google's internal systems and
ations, including various types of Google's internal
ects, identifiers, and their proprietary functionalities that
gle maintains as confidential in the ordinary course of
usiness and is not generally known to the public or
gle's competitors. Such confidential and proprietary
rmation reveals Google's internal strategies, system
gns, and business practices for operating and
taining many of its important services, and falls within
protected scope of the Protective Order entered in this
n. See Dkt. 81 at 2-3. Public disclosure of such
idential and proprietary information could affect
gle's competitive standing as competitors may alter
systems and practices relating to competing products.
nay also place Google at an increased risk of
ersecurity threats, as third parties may seek to use the
rmation to compromise Google's internal practices
ing to competing products.

1	5. Google's request is narrowly tailored in order to protect its confidential information.	
2	These redactions are limited in scope and volume. Because the proposed redactions are narrowly	
3	tailored and limited to portions containing Google's highly-confidential or confidential information,	
4	Google requests that the portions of the aforementioned documents be redacted from any public	
5	version of those documents.	
6	6. Google does not seek to redact or file under seal any of the remaining portions of	
7	Plaintiffs' Administrative Motion not indicated in the table above.	
8		
9	I declare under penalty of perjury of the laws of the United States that the foregoing is true	
10	and correct. Executed in San Francisco, California on August 16, 2022.	
11		
12	DATED: August 16, 2022 QUINN EMANUEL URQUHART & SULLIVAN, LLP	
13	SOEEI VIIIV, EEI	
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15	By <u>/s/ Jonathan Tse</u> Jonathan Tse	
16	Attorney for Defendant	
17	Miorney for Defendant	
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